

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

GESTURE TECHNOLOGY PARTNERS, LLC,  v.  HUAWEI DEVICE CO., LTD., HUAWEI DEVICE USA, INC.,  Defendants.	<b>JURY TRIAL DEMANDED</b>  C.A. NO. 2:21-cv-00040-JRG  LEAD CONSOLIDATED CASE
SAMSUNG ELECTRONICS CO., LTD. AND SAMSUNG ELECTRONICS AMERICA, INC.,  Defendants.	C.A. NO. 2:21-cv-00041-JRG

**JOINT NOTICE REGARDING MEDIATION**

Plaintiff Gesture Technology Partners, LLC (“GTP”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (“Defendants”) (collectively, the “Parties”) hereby provide notice that they believe this case is amenable to mediation. The Parties have conferred and agreed to mediate in front of the Honorable David Folsom.

Judge Folsom may be contact at:

Honorable David Folsom  
Jackson Walker L.L.P  
6004 Summerfield Drive, Suite B  
Texarkana, TX 75503

Accordingly, the Parties respectfully request that the Court enter an order appointing the Honorable David Folsom as the mediator between the parties. The parties request the Court’s permission to allow Dr. Timothy Pryor to attend the mediation by video conference due to his age and health concerns; all other participants will attend in person.

Dated: October 27, 2021

Respectfully submitted,

By: /s/ Fred I. Williams  
Fred I. Williams  
Texas State Bar No. 00794855  
Michael Simons  
Texas State Bar No. 24008042  
Robert Daniel Garza  
Texas State Bar No. 24097730  
Robert Rhodes  
Texas State Bar No. 24116958  
WILLIAMS SIMONS & LANDIS PLLC  
The Littlefield Building  
601 Congress Ave., Suite 600  
Austin, TX 78701  
Tel: 512-543-1354  
[fwilliams@wsltrial.com](mailto:fwilliams@wsltrial.com)  
[msimons@wsltrial.com](mailto:msimons@wsltrial.com)  
[dgarza@wsltrial.com](mailto:dgarza@wsltrial.com)  
[rrhodes@wsltria.com](mailto:rrhodes@wsltria.com)

Todd E. Landis  
State Bar No. 24030226  
WILLIAMS SIMONS & LANDIS PLLC  
2633 McKinney Ave., Suite 130 #366  
Dallas, TX 75204  
Tel: 512-543-1357  
[tlandis@wsltrial.com](mailto:tlandis@wsltrial.com)

John Wittenzellner  
Pennsylvania State Bar No. 308996  
WILLIAMS SIMONS & LANDIS PLLC  
1735 Market Street, Suite A #453  
Philadelphia, PA 19103  
Tel: 512-543-1373  
[johnw@wsltrial.com](mailto:johnw@wsltrial.com)

Kevin S. Kudlac  
Texas Bar No. 00790089  
Kudlac PLLC  
1916 Wimberly Lane  
Austin, TX 78735  
Tel: 512-656-5743  
[kevin@kudlacIP.com](mailto:kevin@kudlacIP.com)

*Attorneys for Plaintiff Gesture Technology  
Partners, LLC*

*/s/ Christopher W. Kennerly*

Christopher W. Kennerly (TX Bar No. 00795077)

chriskennerly@paulhastings.com

Radhesh Devendran (*pro hac vice*)

radheshdevendran@paulhastings.com

PAUL HASTINGS LLP

1117 S. California Avenue

Palo Alto, CA 94304

Telephone: (650) 320-1800

Facsimile: (650) 320-1900

Allan M. Soobert

allansoobert@paulhastings.com

PAUL HASTINGS LLP

2050 M Street NW

Washington, D.C. 20036

Telephone: 202-551-1700

Facsimile: 202-551-1705

Elizabeth L. Brann

elizabethbrann@paulhastings.com

PAUL HASTINGS LLP

4747 Executive Drive, 12th Floor

San Diego, CA 92121

Telephone: (858) 458-3000

Facsimile: (858) 458-3005

Robert Laurenzi robertlaurenzi@paulhastings.com

PAUL HASTINGS LLP

200 Park Avenue

New York, NY 10166

Telephone: (212) 318-6000

Facsimile: (212) 319-4090

Melissa R. Smith (TX Bar No. 24001351)

GILLAM & SMITH, LLP

303 S. Washington Ave.

Marshall, TX 75670

Telephone: (903) 934-8450

Facsimile: (903) 934-9257

melissa@gillamsmithlaw.com

*Attorneys for Defendants Samsung Electronics Co.,  
Ltd and Samsung Electronics America, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on October 27, 2021 the undersigned caused a copy of the foregoing document to be served on all counsel of record, via the Court's CM/ECF system, pursuant to the Federal Rules of Civil Procedure.

*/s/ Fred I. Williams*  
Fred I. Williams

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel for Defendants and counsel for Gesture Technology Partners, LLC met and conferred, and all parties agree to filing the foregoing document as a joint notice.

*/s/ Fred I. Williams*  
Fred I. Williams